

EXHIBIT B

From: [Herrington, Beth](#)
To: [Keith Altman](#); "[Benjamin Jeffers](#)"
Cc: [Tianna Dix](#); [Kelly Casey](#)
Subject: RE: Michigan JPay
Date: Friday, September 13, 2019 11:18:05 AM
Attachments: [mg_info.txt](#)

We agree that the individuals listed in your letter may arbitrate individually before the AAA (under the Kensu terms).

Our class waiver is effective and we reserve all rights concerning its enforcement.

Beth

Beth Herrington

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From: Keith Altman <kaltman@excololaw.com>
Date: Thursday, Sep 12, 2019, 6:15 AM
To: Herrington, Beth <beth.herrington@morganlewis.com>, 'Benjamin Jeffers' <bjeffers@hhbjlaw.com>
Cc: Tianna Dix <tdix@excololaw.com>, Kelly Casey <kcasey@excololaw.com>
Subject: RE: Michigan JPay

[EXTERNAL EMAIL]

Beth,

Thank you. We will wait a couple of more days before we start filing in court.

Keith

Keith Altman

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Licensed in California and Michigan

From: Herrington, Beth [<mailto:beth.herrington@morganlewis.com>]
Sent: Thursday, September 12, 2019 9:14 AM
To: Keith Altman <kaltman@excololaw.com>; 'Benjamin Jeffers' <bjeffers@hhbjlaw.com>
Cc: Tianna Dix <tdix@excololaw.com>; Kelly Casey <kcasey@excololaw.com>
Subject: RE: Michigan JPay

Keith — We do not waive arbitration. I am speaking with the client to today and will be back

to you.

Thanks—
Beth

Beth Herrington

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From: Keith Altman <kaltman@excololaw.com>

Date: Thursday, Sep 12, 2019, 8:12 AM

To: Herrington, Beth <beth.herrington@morganlewis.com>, 'Benjamin Jeffers' <bjeffers@hhbjlaw.com>

Cc: Tianna Dix <tdix@excololaw.com>, Kelly Casey <kcasey@excololaw.com>

Subject: Michigan JPay

[EXTERNAL EMAIL]

Beth and Ben,

On August 26th I sent you a letter outlining a number of claims by prisoners in the MDOC. I have attached another copy for your convenience. In the letter, we asked you to consent to arbitrations under the same terms as Kensu and gave you 14 days to respond. We have not heard any response.

Given your lack of response, we are assuming that you are waiving arbitration and will be filing cases in federal court and will indicate them as related cases to Kensu.

Lastly, we will be sending another letter next week on several additional cases and a request for consent to arbitrate under the same terms as Kensu.

Keith

Keith Altman

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